

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
BRUNSWICK DIVISION

C.J., a minor, by and through her )  
next friend and guardian, BETTY )  
JEAN MURPHY JAMES, )

and )

BETTY JEAN MURPHY JAMES, )  
as Administrator of the Estate of )  
Latoya James )

Plaintiffs, )

v. )

MICHAEL BLAQUIERE, in his )  
individual capacity, as Camden County )  
Deputy Sheriff )

and )

DOWNY CASEY, in his individual )  
capacity, as a Camden County Deputy )  
Sheriff )

and )

JOHN/JANE DOES, in their individual )  
capacities, as Camden County Deputies )

Defendants. )

CIVIL ACTION  
FILE NO.: 2:22-CV-00078-LGW-BWC

**CONSENT MOTION FOR LEAVE TO DEPOSE  
CONFINED PERSON AND BRIEF IN SUPPORT**

COME NOW plaintiffs and defendants, and pursuant to FED. R. Civ. P. 30(a)(2), request the Court for leave to depose Varshan Lamont Brown, an incarcerated person, showing the Court as follows:

Plaintiffs have filed this action alleging decedent Latoya James' constitutional rights were violated during the execution of a search warrant on May 4, 2021, at a residence located in Woodbine, Camden County, Georgia. Varshan Lamont Brown was present at the residence at the time the search warrant was executed. Upon information and belief, Varshan Lamont Brown is currently incarcerated at the Brantley County Jail located in Nahunta, Georgia. The parties agree that Mr. Brown's deposition is necessary to the prosecution and defense of this case.

Under FED. R. CIV. P. 30(a)(2), leave of Court is required to depose a person incarcerated in a prison. The parties seek to depose Mr. Brown at a time that is mutually convenient to the Brantley County Jail and counsel of record.

Consented to this 23<sup>rd</sup> day of June, 2023.

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*\*signed with express permission by  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day electronically submitted the foregoing **CONSENT MOTION FOR LEAVE TO DEPOSE CONFINED PERSON AND BRIEF IN SUPPORT** to the Clerk of Court using the CM/ECF system which will automatically send electronic mail notification of such filing to counsel of record who are CM/ECF participants.

Counsel of record are:

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This 23<sup>rd</sup> day of June, 2023.

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